July 13, 1977

Ryder Truck Rental 1401 East Trafficway Springfield, Missouri 65802

Dear Sirs:

On a recent occasion, surveillance and enforcement personnel from this office found that a substance resembling crankcase oil had apparently been drained or discharged to the curb at the side of your property. This office has no way of knowing who might be responsible.

Let me advise you that if this spillage is due to any activities on your part, this constitutes violations of City, State, and Federal laws. The law contains severe penalties for the discharge of oil or petroleum products. This office maintains periodic surveillance throughout the corporate limits of the City, and will watch this area closely. If the discharge described is not due to any activity on your part, you can help significantly by reporting any such activities immediately to this office.

If we can be of any help or can answer any questions, please do not hesitate to call.

Yours truly,

Gary J. Pendergrass
Water Pollution Control Inspector II
Surveillance and Enforcement

cc: Mr. John Nixon Public Works File Ryder Truck Rental 1401 East Trafficway Springfield, MO 65802

Dear Sirs:

This letter will confirm our conversation concerning a release of waste oil from your business. As you were informed, the spillage of oil is a violation of federal, state, and local law. These laws have penalty sections for violations, whether unintentional or not.

A point that was not discussed, but is important, is the location of your waste oil tank. If we experienced a high intensity rainfall event, or your outside trench drains were unable to drain storm water, the openings to your waste oil tank could become submerged. If the tank caps/plugs were not liquid tight, as was observed, water could enter the tank and the oil displaced because of its lowere specific gravity.

While the above scenario contains many ifs, this office has responded to spills caused by water displacement. Waste oil is regulated as a hazardous waste in Missouri, so it may be prudent for Ryder Truck Rental to review its waste oil storage integrity. If you have any questions, please do not hesitate to contact this office.

Yours truly,

Stephen D. Short

Water Pollution Control Inspector II

Surveillance & Enforcement

SDS: 38

cc: Chuck Kroeger, Missouri Dept. of Natural Resources File (2)